

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

| | | |
|---------------------------------------|---|----------------------------|
| JANE DOE #1, on behalf of herself and |) | |
| all others similarly situated |) | |
| |) | |
| Plaintiffs, |) | CIVIL ACTION NO: |
| |) | 7:21-cv-00220-LSC |
| v. |) | |
| |) | Honorable L. Scott Coogler |
| MG FREESITES, LTD, d/b/a |) | |
| “PORNHUB,” et al., |) | |
| |) | |
| |) | |
| Defendants. |) | |

**PLAINTIFF’S STATEMENT REGARDING
REMAINING DISCOVERY DISPUTES**

In accordance with this Court’s March 31, 2024 Order doc. 194, Plaintiff Jane Doe #1 (“Plaintiff”) provides the Court with her statement regarding remaining discovery disputes connected to Plaintiff’s Motion to Compel, docs. 175 & 181, and Defendants’ Motion to Compel, docs. 187 & 192. Plaintiff and Defendants MG Freesites, Ltd., d/b/a “Pornhub”; MG Freesites II Ltd.; MindGeek, S.A.R.L.; MindGeek USA, Inc.; MG CY Holdings Ltd.; MindGeek Content RT Limited; 9219-1568 Quebec Inc.; MG Billing Ltd. (“Defendants”) have met on multiple occasions to attempt to resolve their discovery disputes, including on

March 18, April 1st, and April 4th. Plaintiff and Defendants have also communicated in writing regarding the substance of these disputes on March 19, March 20, March 21, March 25, March 26, March 27, March 29th, April 3rd, and April 4th.

As a result of these discussions, Plaintiff has supplemented her Objections and Responses to Interrogatory Numbers 26, 37, 38, and 40 and Request for Admission Numbers 22 and 26. Similarly, Defendants produced documents responsive to Plaintiff's Motion to Compel on March 15th, March 22nd, and April 5th. Despite these efforts, areas of disagreement remain unresolved, and Plaintiff believes a hearing on her Motion to Compel, docs. 175 & 181, is still needed.

With regard to Plaintiff's Motion to Compel, Plaintiff and Defendants are still conferring and attempting to resolve whether Plaintiff is entitled to historical versions and commentary on responsive Google Documents and Google Sheets, additional responsive JIRA tickets from the Defendants' engineering department, responsive Internal Wiki pages from the Defendants' engineering department, responsive Zendesk and Kayako tickets, responsive Google Analytics documents, responsive CMS data exports, responsive moderation employee records, documents relating to TOS-8 numbers, and responsive ICQ messages. It is Plaintiff's counsel's understanding that Defendants are not willing to provide

responsive documents relating to TOS-14 Numbers, TOS-14 items, or PII associated with potential, suspected, or apparent CSAM.

With regard to Defendants' Motion to Compel, Plaintiff has supplemented her Objections and Responses to Interrogatory Numbers 26, 37, 38, and 40 and Request for Admission Numbers 22 and 26, and she does not believe that Defendants are entitled to any supplemental responses with regard to the remaining discovery requests at issues in Defendants' Motion. Plaintiff intends to file an opposition to Defendants' Motion to Compel in advance of the April 25th Hearing.

Dated: April 5, 2024

Respectfully submitted,

/s/ Gregory Zarzaur

Gregory Zarzaur (ASB-0759-E45Z)

One of the Attorneys for the Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on this, the 4th day of April 2024, a copy of the foregoing was served on all counsel of record in this matter via the Court's CM/ECF system.

/s/ Gregory Zarzaur
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